

UNITED STATES OF AMERICA

v.

Manning, Bradley E.
PFC, U.S. Army,
HHC, U.S. Army Garrison,
Joint Base Myer-Henderson Hall
Fort Myer, Virginia 22211

Prosecution Disclosure
to the Defense

3 August 2012

The United States responds to the Court's Order, dated 29 May 2012 as follows:


1. On 3 August 2012, the United States filed an *ex parte* motion requesting the Court consider that motion *in camera* and *ex parte* under MRE 505(g)(2) and to authorize redactions of portions of the Federal Bureau of Investigation (FBI) file under MRE 505(g)(2) that are not relevant and necessary for production under RCM 703(f). The United States requested the Court authorize redactions under MRE 505(g)(2)(A). See Enclosure 1. The United States seeks to protect information relating to national security investigations.

2. On 3 August 2012, the United States filed an *ex parte* motion requesting the Court consider that motion *in camera* and *ex parte* under MRE 505(g)(2) and to authorize redactions of portions of the Office of the National Counterintelligence Executive (ONCIX) damage assessment under MRE 505(g)(2) that are neither favorable to the accused and material to guilt or punishment, nor relevant and necessary for production under RCM 703(f). The United States requested the Court authorize redactions under MRE 505(g)(2)(A). See Enclosure 2. The United States seeks to protect information relating to intelligence activities, intelligence sources or methods, and foreign relations or foreign activities of the United States, all within the national security interests of the United States.

3. On 3 August 2012, the United States filed a motion requesting the Court consider the enclosures *in camera* and *ex parte* under MRE 505(g)(2) and to authorize redactions of portions of Defense Intelligence Agency (DIA) records under MRE 505(g)(2) that neither involve investigation, damage assessment, or mitigation measures, nor are otherwise subject to discovery or production under Brady, RCM 701(a)(2), RCM 701(a)(6), or RCM 703(f). The United States requested the Court authorize redactions under MRE 505(g)(2)(A). See Enclosure 3. The United States seeks to protect information relating to intelligence activities and intelligence sources or methods, all within the national security interests of the United States.

4. On 3 August 2012, the United States filed an *ex parte* motion requesting the Court consider that motion *in camera* and *ex parte* under MRE 505(g)(2) and to authorize a substitution of the portion of the Central Intelligence Agency (CIA) report referenced in Appellate Exhibit CCVIII that is favorable to the accused and material to guilt or punishment or relevant and necessary for production under RCM 703(f). The United States requested the Court authorize a summary under MRE 505(g)(2)(B). See Enclosure 4. The United States seeks to protect information

relating to intelligence activities, intelligence sources or methods, and foreign relations or foreign activities of the United States, all within the national security interests of the United States.


JODEAN MORROW
CPT, JA
Assistant Trial Counsel

4 Encls

1. Government *ex parte* Motion (FBI) [unclassified redacted version]
2. Government *ex parte* Motion (ONCIX) [unclassified redacted version]
3. Government Motion (DIA)
4. Government *ex parte* Motion (CIA) [unclassified redacted version]